

Ex. B
Parties' Proposal for Limitations on Discovery

A. Requests for Admission

Each party may be served with a maximum of 30 requests for admission. Any requests for admission directed to authentication of documents are excluded from this limitation.

B. Interrogatories

Each party may be served with a maximum of 25 interrogatories, including contention interrogatories.

C. Depositions

Plaintiff's proposal: For each Party, its employees and former employees may be deposed upon oral examination for a total of 20 hours, split between no more than 5 individuals. Each Party may also be served with a 30(b)(6) deposition notice including no more than 20 discrete topics; time for any Party's 30(b)(6) deposition is limited to 7 hours on the record.

Defendants' proposal: Each Side shall be entitled to a total of 35 hours of deposition time with no individual witness being deposed for more than 7 hours on the record. "Side" means a Party or a group of Parties with a common interest. These limitations may be modified upon a showing of good cause. The group of Defendants as a whole make up one "Side."